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January 20, 2022

**VIA ECF**

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Centre Street, Room 2202  
New York, New York 10007

Re: *Accent Delight International Ltd. et al. v. Sotheby's et al.*, 18 Civ. 9011

Dear Judge Furman:

We write respectfully on behalf of Defendants Sotheby's and Sotheby's, Inc. (collectively, "Sotheby's") pursuant to Section 7(C)(iii) of Your Honor's Individual Rules and Practices in Civil Cases and paragraph 4.5 of the February 28, 2020 Amended Protective Order (the "Protective Order"), *see* ECF No. 145 ¶ 4.5, to request permission to file redacted copies of (i) Sotheby's January 20, 2022 Memorandum of Law in Support of Sotheby's Motion to Exclude in Part the Testimony of Plaintiffs' Expert Guy Stair Sainty; (ii) Sotheby's January 20, 2022 Memorandum of Law in Support of Sotheby's Motion to Exclude the Testimony of Plaintiffs' Purported Expert Robert Wittman; (iii) Exhibits A, G–K to the January 20, 2022 Declaration of Marcus A. Asner; and (iv) Exhibits A–C to the January 20, 2022 Declaration of Benjamin C. Wolverton. Sotheby's will file under seal an unredacted version of each document contemporaneously with the filing of this letter.

Further, Sotheby's requests permission to file slip sheets in lieu of Exhibits B–F to the January 20, 2022 Declaration of Marcus A. Asner and Exhibits D to the January 20, 2022 Declaration of Benjamin C. Wolverton. Sotheby's will also file under seal each exhibit contemporaneously with the filing of this letter.

The redacted and/or omitted portions of Sotheby's filing are comprised of, quote from, or refer to documents that the parties or third parties have designated as Confidential and/or Attorneys' Eyes Only pursuant to paragraphs 2.2 and 2.4 of the Protective Order.



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We thank the Court for its consideration of this letter.

Respectfully,

/s/ Sara L. Shudofsky  
Sara L. Shudofsky

cc: All counsel of record (via ECF)

The motion to seal is granted temporarily. The Court will assess whether to keep the materials at issue sealed or redacted when deciding the underlying motion. The Clerk of Court is directed to terminate ECF No. 369.

SO ORDERED.

A handwritten signature in black ink, appearing to read "Jesse M. Furman", written over the "SO ORDERED." text.

January 24, 2022